

**EXHIBIT A**

**DECLARATION OF ELLIOT B. PLATT**

1. I am counsel to Katherine Zebroski in this case, and I have been her counsel on the issues in this case since the inception of the case.

2. I graduated from the University of Pennsylvania Law School in 1966, and I was admitted to practice before the Pennsylvania Courts in 1968.

3. I am admitted to practice before the Pennsylvania Supreme Court, the United States District Court for the Eastern District of Pennsylvania, the United States Court of Appeals for the Third Circuit, the United States Court of Appeals for the Federal Circuit, and the United States Supreme Court. I have been admitted *pro hac vice* in the United States District Court for the Middle District of Pennsylvania, the United States District Court for the District of New Jersey, and the United States District Court for the District of Delaware.

4. From 1967 to 1982, I was employed at Community Legal Services, Inc., in Philadelphia, Pennsylvania, engaged in the civil practice of law on behalf of indigent persons. For most of the last thirteen years that I was at Community Legal Services, Inc., I supervised other attorneys, first as Managing Attorney of neighborhood law offices, then as Chief of Litigation, supervising Managing Attorneys, and then as head of a unit that provided services to clients in prisons, mental hospitals and institutions for the developmentally disabled. I was also involved in hiring new attorneys and in providing assistance to all attorneys in neighborhood offices in substantive, procedural and ethical issues.

5. From 1982 to the present, I have been engaged in the private practice of law. Except for a period from September, 1988 to June, 1989, when I was associated with a firm, I have been a sole practitioner since 1982. My practice includes a wide variety of civil litigation, with a high percentage of cases involving employment issues. Most of my employment practice is on behalf of employees, but I have represented employers both in litigation and in counseling.

6. I have tried cases in the Courts of Common Pleas in Philadelphia, Montgomery, Bucks and Delaware Counties, Pennsylvania (including in the Orphans' Courts in Philadelphia and Montgomery Counties), in the Commonwealth Court of Pennsylvania, and in the United States District Courts for the Eastern District of Pennsylvania, for the Middle District of Pennsylvania and for the District of New Jersey. I have represented a client in the United States District Court for the District of Delaware. I have argued appeals in the Commonwealth Court of Pennsylvania, the Superior Court of Pennsylvania, the Supreme Court of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States Court of Appeals for the Federal Circuit. I have filed three petitions for Writ of Certiorari in the Supreme Court of the United States.

7. I serve as an Arbitrator for the Philadelphia County Court of Common Pleas, for the United States District Court for the Eastern District of Pennsylvania, and for the Financial Industry Regulatory Authority (FINRA).

8. My practice has included many complex issues in various substantive areas, including employment law, the Employee Retirement Income and Security Act (ERISA), and the Racketeer Influenced and Corrupt Organizations Act (RICO).

9. I have been member of the faculty of the Pennsylvania Bar Institute program presented in conjunction with this Court on Litigating Employment Discrimination Cases.

10. I am a member of the panel of attorneys who are available for appointment by this Court to represent *pro se* plaintiffs in employment cases.

11. I am a member of the National Employment Lawyers Association and of its Eastern Pennsylvania Chapter.

12. In 2005, I was named a Pennsylvania Super Lawyer.

13. My fee in this case is contingent on Ms. Zebroski's success.

14. Attached hereto as Exhibit 1 is a true and correct record of the time expended and the expenses incurred in representation of Ms. Zebroski in this case. It is a database of contemporaneously recorded items of time and expense.

15. Exhibit 1 has been prepared from my full record of time and expenses. It excludes activity and expenses that were clearly not related to the issues on which Ms. Zebroski prevailed.

16. All the time and expenses in Exhibit 1 were necessary for the case and were reasonably incurred. Plaintiff had to respond to a Motion to Dismiss, and to file a Motion to Compel Discovery on the wage issues. In addition, the records that Defendants produced as to Ms. Zebroski's pay were so unclear and confusing that several calculations were required to determine the amount of Ms. Zebroski's minimum wage claims. It was also necessary to take the deposition of Defendants' accountant to try to understand how Defendants calculated Ms. Zebroski's pay. Further, the evidence had to be evaluated in light of the "tip credit" provisions of the minimum wage laws.

17. The total hours set out in Exhibit 1 for time expended other than for preparing this Motion is 167.3 Reducing that number by 20% to account for the fact that Ms. Zebroski was partially successful on her claims, the total hours claimed is 133.8. At an hourly rate of \$400.00, the total fee should be \$53,520.00. Time spent to date on the Motion for Allowance of Counsel Fee and Costs is 6.5 hours. At \$400.00 per hour, the fee for those hours is \$2,600.00.

18. The total expenses set out in Exhibit 2 are \$5,258.12 after excluding expense that related solely to claims on which Ms. Zebroski was not successful. They include

Filing Fee	350.00
Xerox, Kaufman, J. Procedures	6.75
Xerox, Complaint for Service	3.15
Service of Complaint	75.00
Witness Fee, F. Mayo, Dep.	40.00

Witness Fee, F. Mayo Trial	40.00
Taxi to Court for Trial	7.20
Taxi to Office from Trial	5.00
Service, Mayo Dep. Subpoena	40.00
Service, Mayo Trial Subpoena	40.00
Zebroski Dep. Transcript	914.25
Xerox, Trial Exhibits	222.04
Xerox, Document Production	63.07
Gouak Deposition Transcript	937.50
Mayo Deposition Transcript	622.50
Lauinger Deposition Transcript	735.00
Projection Equipment for Trial	1130.71
Federal Express, Trial Exs. to G. Egan	15.95
 Total	 \$5258.12

(Defense counsel had agreed to pay one-half the cost of the projection equipment but has not done so. This Motion seeks full payment from Defendants.) Most of those costs were required for the case irrespective of the number of claims, for example, the filing fee, service fees, etc. The Gouak, Lauinger and Zebroski depositions covered all the issues in the case. Therefore, it is appropriate to reduce the cost of those depositions, \$2,586.75, by 20%, \$517.35, to \$2,069.40. The total costs claimed is \$5,258.12 minus \$517.35, for a total of \$4,740.77.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 11, 2011

s/ Elliot B. Platt  
ELLIOT B. PLATT

**EXHIBIT 1**

## ELLIOT B. PLATT

ATTORNEY AT LAW

Suite 1930 Two Penn Center Plaza  
 1500 John F. Kennedy Boulevard  
 Philadelphia, PA. 19102

Bill To  
 Zebroski

Telephone 215-564-5551  
 Fax 215-564-1357  
 Email [ebplatt@att.net](mailto:ebplatt@att.net)

Date  
 04/06/11

Date	Activity	Description	Hours	Rate	Fee
01/06/09	Conference	With Client	1.8	400.00	720.00
02/06/09	Conference	With Client	1.8	400.00	720.00
02/11/09	Telephone Conf.	Client	0.3	400.00	120.00
02/11/09	Legal Research	Re FLSA and Other Claims	1.3	400.00	520.00
02/12/09	Telephone Conf.	Client	0.2	400.00	80.00
02/16/09	Telephone Conf.	Client	0.3	400.00	120.00
02/23/09	Telephone Conf.	Client	0.4	400.00	160.00
02/23/09	File Review	Computation of Pay	0.4	400.00	160.00
02/25/09	Fact Research	Calculate Wage and FLSA Claims	1.3	400.00	520.00
03/03/09	Telephone Conf.	Client	0.1	400.00	40.00
03/04/09	Legal Research	FLSA Statute and Regs.	1.2	400.00	480.00
03/05/09	File Review	Review and Analysis of FLSA Claims	1.4	400.00	560.00
03/11/09	Conference	With Client (75\$ re FLSA)	0.8	400.00	320.00
03/12/09	Telephone Conf.	Client (50% FLSA)	0.3	400.00	120.00
03/19/09	Fact Research	Calclulate Hours (FLSA)	0.3	400.00	120.00
04/17/09	Draft	Complaint (50%)	0.5	400.00	200.00
04/22/09	Draft	Complaint; Calclulate Min. Wage Damages	0.6	400.00	240.00
04/23/09	Legal Research	Re Federal and State Minimum Wage Damages; Draft Complaint re Min. Wage	0.6	400.00	240.00

Total

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Email ebpatt@att.netDate  
04/06/11

Date	Activity	Description	Hours	Rate	Fee
06/10/09	Review	Motion to Dismiss (Wage Payment and Collection Law)	0.3	400.00	120.00
06/17/09	Legal Research	and Draft Resp. to Motion, FLSA Issues	1	400.00	400.00
06/18/09	Legal Research	and Draft Resp. to Motion to Dismiss, FLSA Issues	0.2	400.00	80.00
06/18/09	Legal Research	and Draft Resp. to Motion to Dismiss, Wage Payment Law Issues	1.2	400.00	480.00
06/19/09	Legal Research	and Draft Resp. to Motion to Dismiss, Wage Payment Law Issues	1.1	400.00	440.00
06/24/09	Telephone Conf.	J. Ogren - re FLSA Claim	0.3	400.00	120.00
06/25/09	Telephone Conf.	Client - re FLSA Claim	0.1	400.00	40.00
07/15/09	Telephone Conf.	Client	0.4	400.00	160.00
07/20/09	Review	G. Bochetto Letter	0.2	400.00	80.00
07/20/09	Correspondence		0.2	400.00	80.00
07/22/09	Telephone Conf.	Client	0.2	400.00	80.00
07/30/09	Telephone Conf.	With Client re FLSA	0.1	400.00	40.00
08/11/09	Telephone Conf.	J. Ogren	0.3	400.00	120.00
08/13/09	Telephone Conf.	Client - re Retaliation and FLSA	0.3	400.00	120.00
08/14/09	Draft	Proposed Rule 26(f) Report	0.2	400.00	80.00
08/14/09	Correspondence		0.1	400.00	40.00
					Total

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04/06/11

Date	Activity	Description	Hours	Rate	Fee
08/21/09	Telephone Conf.	Client re FLSA and Retaliation	0.3	400.00	120.00
09/04/09	Telephone Conf.	Client	0.4	400.00	160.00
09/10/09	Review	Memorandum and Order	0.1	400.00	40.00
09/10/09	Telephone Conf.	Client	0.1	400.00	40.00
09/29/09	Review	Defts' Proposed Rule 26(f) Conference Report	0.2	400.00	80.00
10/01/09	Telephone Conf.	J. Ogren	0.1	400.00	40.00
10/01/09	Draft	Rule 26(f) Report	0.1	400.00	40.00
10/07/09	Telephone Conf.	Client	0.2	400.00	80.00
10/12/09	Correspondence		0.1	400.00	40.00
10/19/09	Telephone Conf.	J. Ogren re Minimum Wage	0.3	400.00	120.00
10/21/09	Draft	Answer to Defts' First Interrogatories re Minimum Wage	0.2	400.00	80.00
10/21/09	File Review	Calculations re Min. Wage Claims	0.2	400.00	80.00
10/22/09	Telephone Conf.	Client re Min. Wage Claims	0.3	400.00	120.00
10/22/09	Draft	Second Request for Production of Documents re Min. Wage	0.2	400.00	80.00
10/23/09	Telephone Conf.	Client re Min. Wage	0.2	400.00	80.00
10/30/09	Conference	With Client re Minimum Wage (total conf., 2 hours)	0.4	400.00	160.00
					Total

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04/06/11

Date	Activity	Description	Hours	Rate	Fee
11/11/09	Conference	With Client re Min. Wage (Total conf., 2.2 hours)	0.4	400.00	160.00
11/17/09	Prepare for	Document Production re Min. Wage (Total 1.0 hour)	0.3	400.00	120.00
11/24/09	Telephone Conf.	Client	0.2	400.00	80.00
11/30/09	Telephone Conf.	With Client re Min. Wage (Total conf., 0.4 hour)	0.2	400.00	80.00
12/07/09	Legal Research	and Draft Discov. Mo.	3.8	400.00	1,520.00
12/07/09	Legal Research	and Draft Motion to Compel	3.8	400.00	1,520.00
12/08/09	Legal Research	Discovery re Min. Wage			
12/08/09	Legal Research	and Draft Discov. Mo.	1	400.00	400.00
12/08/09	Legal Research	and Draft Motion to Compel	1	400.00	400.00
12/08/09	Legal Research	Discovery re Min. Wage			
01/19/10	Telephone Conf.	G. Egan	0.1	400.00	40.00
01/21/10	Telephone Conf.	Client	0.1	400.00	40.00
01/30/10	Review Discovery Resps.	Documents from Defendants	0.3	400.00	120.00
02/01/10	Review Discovery Resps.	Documents from Defendants	0.2	400.00	80.00
02/01/10	Correspondence	Client, E-Mail	0.1	400.00	40.00
02/01/10	Telephone Conf.	G. Egan	0.1	400.00	40.00
02/01/10	Telephone Conf.	Client	0.4	400.00	160.00
02/02/10	Telephone Conf.	G. Egan, D. Bridgers	0.1	400.00	40.00
02/03/10	Telephone Conf.	Client	0.1	400.00	40.00
					Total

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Date	Activity	Description	Hours	Rate	Fee
02/04/10	Telephone Conf.	D. Bridgers	0.2	400.00	80.00
02/05/10	Review Discovery Resps.		0.2	400.00	80.00
02/05/10	Draft	Third Request for Production	0.1	400.00	40.00
02/05/10	Telephone Conf.	Client	0.3	400.00	120.00
02/08/10	Conference	With D. Bridgers and Documents	2	400.00	800.00
02/08/10	Telephone Conf.	Client	0.6	400.00	240.00
02/12/10	Telephone Conf.	Client	0.1	400.00	40.00
02/12/10	Legal Research	FLSA Retaliation	0.3	400.00	120.00
02/15/10	Legal Research	FLSA Retaliation	0.4	400.00	160.00
02/15/10	Conference	With Client	1.5	400.00	600.00
02/15/10	Draft	Supplemental Complaint	0.5	400.00	200.00
02/15/10	Legal Research	Rule 15(d)	0.2	400.00	80.00
02/16/10	Review Discovery Resps.		0.1	400.00	40.00
02/16/10	Telephone Conf.	D. Bridgers	0.2	400.00	80.00
02/17/10	Legal Research	Rule 15(d); Retaliation	0.7	400.00	280.00
02/17/10	Telephone Conf.	Client	0.3	400.00	120.00
02/18/10	Telephone Conf.	Client	0.1	400.00	40.00
02/22/10	Draft	Supplemental Complaint	0.2	400.00	80.00
02/22/10	Draft	and Research Motion re Supp'l Comp.	1.3	400.00	520.00

Total

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04/06/11

Date	Activity	Description	Hours	Rate	Fee
02/23/10	Legal Research	and Draft Mo. re Supplemental Comp.	1.2	400.00	480.00
02/23/10	Correspondence	Egan	0.1	400.00	40.00
02/23/10	Telephone Conf.	Client	0.1	400.00	40.00
03/01/10	Telephone Conf.	Client	0.1	400.00	40.00
03/02/10	Review Discovery Resps.	Documents	0.2	400.00	80.00
03/09/10	Telephone Conf.	G. Egan	0.1	400.00	40.00
03/10/10	Telephone Conf.	Client	0.3	400.00	120.00
03/12/10	Review	Response to Mo. for Supp'l Comp.	0.2	400.00	80.00
03/12/10	Legal Research	Re Resp. to Mo. to Supp. Comp.	0.4	400.00	160.00
03/15/10	Telephone Conf.	Client	0.1	400.00	40.00
03/15/10	Legal Research	And Draft Reply re Supp'al Comp.	1.2	400.00	480.00
03/16/10	Legal Research	And Draft Reply re Supp'al Comp.	0.9	400.00	360.00
03/18/10	Telephone Conf.	Client	0.1	400.00	40.00
03/23/10	Draft	Deposition Notices	0.2	400.00	80.00
03/23/10	Telephone Conf.	Client	0.1	400.00	40.00
03/23/10	Correspondence	G. Egan	0.1	400.00	40.00
03/31/10	Telephone Conf.	D. Bridgers	0.1	400.00	40.00
04/02/10	File Review	And Dep. Preparation	1.3	400.00	520.00
					Total

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04/06/11

Date	Activity	Description	Hours	Rate	Fee
04/05/10	Prepare for	Depositions	0.5	400.00	200.00
04/06/10	Depositions	E. Lauinger	4.5	400.00	1,800.00
04/07/10	Telephone Conf.	R. Hunter (Attorney for F. Mayo)	0.1	400.00	40.00
04/07/10	Telephone Conf.	Client	0.1	400.00	40.00
04/08/10	Telephone Conf.	Client	0.1	400.00	40.00
04/08/10	Prepare for	Gouak Deposition	1	400.00	400.00
04/09/10	Depositions	J. Gouak (and Preparation; Confs. with Client)	6.3	400.00	2,520.00
04/12/10	Conference	Client	2	400.00	800.00
04/13/10	Depositions	Client; Conference with Client; Travel	8.8	400.00	3,520.00
04/15/10	Telephone Conf.	J. Smith	0.1	400.00	40.00
04/16/10	Prepare for	and Deposition of F. Mayo	4.7	400.00	1,880.00
04/19/10	Telephone Conf.	Client	0.3	400.00	120.00
04/21/10	Telephone Conf.	G. Egan	0.2	400.00	80.00
04/22/10	Telephone Conf.	G. Egan	0.5	400.00	200.00
04/26/10	Draft	Spreadsheet of Paychecks	1.3	400.00	520.00
04/27/10	Telephone Conf.	Client	0.2	400.00	80.00
04/27/10	Telephone Conf.	Client	0.2	400.00	80.00
04/28/10	Telephone Conf.	G. Egan	0.2	400.00	80.00
04/29/10	Draft	Proposed Jury Charge	0.8	400.00	320.00
04/29/10	Telephone Conf.	Client	0.2	400.00	80.00
04/29/10	Draft	Proposed Jury Charge	0.8	400.00	320.00
					Total

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04/06/11

Date	Activity	Description	Hours	Rate	Fee
04/30/10	Prepare for	Trial: Damages, Research, Tel. Conf's Client	5.2	400.00	2,080.00
05/02/10	Draft	Proposed Jury Charge	2.6	400.00	1,040.00
05/03/10	Telephone Conf.	G. Egan	0.2	400.00	80.00
05/03/10	Legal Research	And Correspondence, E-Mail to G. Egan	0.9	400.00	360.00
05/03/10	Prepare for	Trial - Exhibits	0.8	400.00	320.00
05/03/10	Draft	Pretrial Memorandum	0.8	400.00	320.00
05/04/10	Prepare for	Trial - Witnesses	2.1	400.00	840.00
05/04/10	Prepare for	Trial - Witnesses, Exhibits	1.2	400.00	480.00
05/05/10	Telephone Conf.	G. Egan	0.2	400.00	80.00
05/05/10	Prepare for	Trial - Witnesses; Pretrial Mem.	1.2	400.00	480.00
05/06/10	Conference	Client	3.3	400.00	1,320.00
05/06/10	Prepare for	Trial - Witnesses	2.8	400.00	1,120.00
05/07/10	Prepare for	Trial; Telephone Confs.; Rev. Defts' Documents	6.5	400.00	2,600.00
05/08/10	Prepare for	Trial - Witnesses	5	400.00	2,000.00
05/09/10	Prepare for	Trial	5	400.00	2,000.00
05/10/10	Attend	Trial; Conference with Client	7.7	400.00	3,080.00
05/10/10	Prepare for	Trial - Witnesses	3	400.00	1,200.00
05/11/10	Attend	Trial; Conf. w/ Client and G. Egan	7	400.00	2,800.00
05/11/10	Prepare for	Trial; Telephone Conf., G. Egan	1.2	400.00	480.00
					Total

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04/06/11

Date	Activity	Description	Hours	Rate	Fee
05/12/10	Attend	Trial	7.2	400.00	2,880.00
05/12/10	Draft	Jury Interrogatories	0.5	400.00	200.00
05/12/10	Prepare for	Trial	2.3	400.00	920.00
05/13/10	Attend	Trial	7.5	400.00	3,000.00
05/14/10	Attend	Trial; Conference with Client	5.5	400.00	2,200.00
06/04/10	Conference	Client	1.3	400.00	520.00
06/06/10	Legal Research	Re Wage Payment and Collection Law	0.2	400.00	80.00
06/09/10	Legal Research	And Draft Motion to Amend Judgment	1.2	400.00	480.00
06/11/10	Telephone Conf.	Client	0.1	400.00	40.00
06/17/10	Draft	Motion re Transcript	0.3	400.00	120.00
06/18/10	Draft	Motions to Alter Judgment, to be Excused from Ordering Transcript	0.3	400.00	120.00
07/07/10	Legal Research	And Draft Reply re Motion to Amend Judgment	1.5	400.00	600.00
07/08/10	Legal Research	And Draft Reply re Motion to Amend Judgment	0.6	400.00	240.00
07/13/10	Telephone Conf.	Client	0.3	400.00	120.00
02/03/11	Telephone Conf.	Client	0.2	400.00	80.00
04/04/11	Legal Research	And Draft Motion for Counsel Fee	2.1	400.00	840.00
04/06/11	Legal Research	Re Counsel Fee Motion	0.4	400.00	160.00
					Total

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04/06/11

Date	Activity	Description	Hours	Rate	Fee
04/07/11	Legal Research	And Draft Motion for Counsel Fee	2.8	400.00	1,120.00
04/08/11	Draft	Motion for Counsel Fee	0.9	400.00	360.00
04/11/11	Draft	Motion for Counsel Fee	0.3	400.00	120.00
					Total \$70,640.00

**EXHIBIT 2**

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04/11/11

Date	Activity	Description	Hours	Rate	Fee
Reimb Group					
05/01/09		Filing Fee		350.00	350.00
05/08/09		Xerox, Kaufman J. Procedure, for Service		6.75	6.75
05/08/09		Xerox Complaint for Service		3.15	3.15
05/27/09		Service, Complaint		75.00	75.00
03/24/10		Witness Fee, F. Mayo, Dep.		40.00	40.00
04/28/10		Witness Fee, F. Mayo, Trial		40.00	40.00
05/10/10		Taxi to Court		7.20	7.20
05/13/10		Taxi Fare, to Office		5.00	5.00
05/13/10		Taxi, Office to Court		10.00	10.00
05/17/10		Service, Mayo Sub., Dep.		40.00	40.00
05/17/10		Service, Mayo Sub., Trial		40.00	40.00
05/17/10		Zebroski Deposition		914.25	914.25
05/17/10		Trial Exhibits		222.04	222.04
05/17/10		Trial Exhibits		63.07	63.07
05/27/10		Gouak Dep.		937.50	937.50
05/27/10		Mayo Dep.		622.50	622.50
05/27/10		Lauinger Dep.		735.00	735.00
06/29/10		Projection Equipment for Trial		1,130.71	1,130.71
06/29/10		Trial Exs. to G. Egan		15.95	15.95
		Total Reimbursable Expenses			5,258.12
				Total	\$5,258.12